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REMARKS

The Examiner has rejected Claims 1-51 under 35 U.S.C. 102(e) as being anticipated by Cheswick et al. (U.S. Patent No. H1994 H). Applicant respectfully disagrees with such rejection, especially in view of the clarifications made hereinabove to each of the independent claims.

With respect to each of the independent claims, the Examiner has relied on Col. 2, lines 38-52; Col. 3, lines 6-25; Col. 4, lines 56-64 and Figure 5 in Cheswick to make a prior art showing of applicant's claimed "address provision logic operable to control said server computer to provide an address for accessing a network to a client computer, in response to a request for an address from said client computer" (see the same or similar, but not necessarily identical language in Claims 1, 15 and 29) and "requesting an address from said server computer, [and] receiving an address from said server computer" (see Claim 43).

Applicant respectfully asserts that simply nowhere in the entire Cheswick reference is there even a suggestion of a "server computer [that]...provide[s] an address for accessing a network to a client computer, in response to a request for an address from said client computer" in the specific manners claimed by applicant (emphasis added). Instead, Cheswick simply relates to a firewall that "is attached to a communications port of the client" (Col. 2, lines 38-52).

Still with respect to each of the independent claims, the Examiner has again relied on Col. 2, lines 38-52; Col. 3, lines 6-25; Col. 4, lines 56-64 and Figure 5 in Cheswick to make a prior art showing of applicant's claimed "token validation logic operable in response to said provision of said address to control said server computer to contact said client computer at said address" (see the same or similar, but not necessarily identical language in Claims 1, 15 and 29) and "receiving a token validation request from said server computer" (see Claim 43).

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Applicant again respectfully asserts that simply nowhere in the entire Cheswick reference is there any teaching of a "server computer [that]...contact[s] said client computer at said address" where the address is that provided by the server computer to the client computer in the context claimed by applicant.

To further emphasize such a distinction between applicant's claim language and the Cheswick reference, applicant has clarified each of the independent claims to incorporate the following highlighted language:

"token validation logic operable in response to said provision of said address to control said server computer to contact said client computer at said address provided to said client computer and to detect a presence of a predefined token on said client computer" (see the same or similar, but not necessarily identical language in Claims 1, 15 and 29); and

"receiving a token validation request from said server computer at said address for said client computer" (see Claim 43).

The Examiner is reminded that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. Of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, the identical invention must be shown in as complete detail as contained in the claim. *Richardson v. Suzuki Motor Co.* 868 F.2d 1226, 1236, 9USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

This criterion has simply not been met by the Cheswick reference, especially in view of the clarifications made hereinabove to each of the independent claims. A notice of allowance or a specific prior art showing of each of the foregoing claimed features, in combination with the remaining claimed features, is respectfully requested.

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Applicant further notes that the prior art is also deficient with respect to the dependent claims. Just by way of example, with respect to Claim 2 et al., the Examiner has relied on Col. 3, lines 10-16 in Cheswick to make a prior art showing of applicant's claimed technique "wherein said token validation logic is operable to control said server computer to check whether said detected predefined token is valid." Applicant notes that such excerpt merely discloses "the dongle (if present) generates a unique identifier, e.g. a token, for transmission back to the executing software program" (emphasis added). Furthermore, applicant notes that the software program in Cheswick is executed by the user (see Col. 3, lines 7-9). Applicant respectfully asserts that a software program executed by a user that checks a token, as in Cheswick, does not meet applicant's specific claim language, namely a "server computer [that]...check[s] whether said detected predefined token is valid" (emphasis added).

With respect to Claims 3-5 and 7 et al., the Examiner has again relied on Col. 3, lines 10-16 in Cheswick to make a prior art showing of applicant's claimed techniques "wherein said token validation logic is operable to control said server computer to revoke said address from said client computer if said token is not detected or is not valid" (Claim 3 et al.), "wherein said token validation logic is operable to control said server computer to record machine data from said client computer if said token is not detected" (Claim 4 et al.), "wherein said token validation logic is operable to control said server computer to signal to said client computer that access has been denied if said token is not detected" (Claim 5 et al.), and "wherein said token validation logic is operable to control said server computer to install said remote configuration software on said client computer if said token is not detected" (Claim 7 et al.).

Applicant respectfully asserts that simply nowhere in such excerpt, nor in the entire Cheswick reference, is there any disclosure of an "address" in the context claimed by applicant (Claim 3 et al.-see arguments above with respect to each of the independent claims). Furthermore, the excerpt relied on by the Examiner merely discloses that "the software program compares the token to an internally stored identifier and permits further execution only the responses match." Clearly, permitting or not permitting execution of a

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software application based on a token comparison does not meet applicant's specific claim language that a server computer "revoke[s] said address from said client computer if said token is not detected or is not valid" (Claim 3 et al.-emphasis added), "record[s] machine data from said client computer if said token is not detected" (Claim 4 et al.-emphasis added), "signal[s] to said client computer that access has been denied if said token is not detected" and (Claim 5 et al.-emphasis added), and "install[s] said remote configuration software on said client computer if said token is not detected" (Claim 7 et al.-emphasis added).

Again, applicant respectfully asserts that the Cheswick reference fails to anticipate all of applicant's specific claim limitations, as noted above. Still yet, applicant brings to the Examiner's attention the subject matter of new Claims 52-53 below, which are added for full consideration:

"wherein said revoking of said address from said client computer results in a denial of network access for said client computer" (see Claim 52); and

"said token validation logic further operable to identify details of said predefined token on said client computer, said details including at least one of an expiration date and a version number, and to validate said details of said predefined token on said client computer" (see Claim 53).

Thus, all of the independent claims are deemed allowable. Moreover, the remaining dependent claims are further deemed allowable, in view of their dependence on such independent claims.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. The

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Commissioner is authorized to charge any additional fees or credit any overpayment to  
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